

EXHIBIT 1

From: [Stephen Stern](#)
To: ["Gregory Jordan"](#)
Cc: [Thomas J. Gagliardo](#); [Heather Yeung](#)
Subject: Boshea v. Compass Marketing, Inc. - Depositions
Date: Friday, October 22, 2021 1:29:00 PM
Attachments: [image001.png](#)

Greg:

I am confused by your email earlier today when you called off Mr. Baggett's deposition. While there are discovery disputes, those disputes have nothing to do with Mr. Baggett's report or deposition. It seems that you are suggesting that all depositions are deferred in this matter pending resolution of the discovery disputes, which is entirely improper.

On a related note, as you know, parties pay the costs of an opposing expert's time. Because you unilaterally cancelled Mr. Baggett's deposition today (after confirming it yesterday), we will be forwarding a bill for you/Mr. Boshea to cover Mr. Baggett's preparation time that was naught.

With respect to Mr. Boshea's deposition and John White's deposition, since you tied the scheduling of Mr. Boshea's deposition to the scheduling of John White's deposition, I propose that we schedule their depositions on back to back days in Chicago. Please let me know some dates that work for the scheduling of these depositions.

Stephen



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